

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

WAYNE BALIGA, derivatively on behalf of
LINK MOTION INC. (F/K/A NQ MOBILE INC.)

1:18-cv-11642

Plaintiff,

-against-

LINK MOTION INC. (F/K/A NQ MOBILE INC.),
VINCENT WENYONG SHI,
JIA LIAN,
XIAO YU,

STIPULATED BRIEFING
SCHEDULE

Defendants,

-and-

LINK MOTION INC. (F/K/A NQ MOBILE INC.),

Nominal Defendant.

WHEREAS, on August 22, 2019, during a telephone conference, the Honorable Magistrate Judge Debra C. Freeman directed counsel for Plaintiff and counsel for Defendant Vincent Shi (the “parties”) to, inter alia, submit a proposed briefing schedule on Plaintiff’s application to serve Defendant Shi by alternative means of service.

WHEREAS, in subsequent letters to the Court on August 29, 2019 (Dkt. 95) and September 9, 2019 (Dkt. 96), the parties proposed a briefing schedule as follows: a joint initial submission due on September 25, 2019; and a joint reply submission due on October 2, 2019.

WHEREAS, on September 17, 2019, the parties called Judge Freeman’s chambers in order to extend the proposed briefing schedule by one week, as follows: joint initial submission due on October 2; and joint reply submission due on October 9, 2019. The clerk informed the parties that she would let Judge Freeman know of the modification and ask the Judge to So Order the schedule.

WHEREAS, on September 25, 2019, after having not heard back from the Court, Defendant Shi, out of an abundance of caution, filed his initial submission. Plaintiff, assuming the modified schedule was in effect, did not make a submission.


WHEREAS, on September 26, 2019, the parties met and conferred regarding the issue, and it is thus:

HEREBY STIPULATED AND AGREED, by and between the undersigned, that Plaintiff's submission on the issue of serving Defendant Shi by alternative means of service shall be due on October 2, 2019; and

IT IS FURTHER STIPULATED AND AGREED, that the parties shall meet and confer after October 2, 2019 to determine whether the parties wish to submit any reply submissions, and, if so, the parties shall advise the court accordingly.

Submitted: September 27, 2019



Michael D. Cilento, Esq.
The Seiden Group
469 Seventh Avenue, Suite 502
New York, NY 10018
646-766-1723
mcilento@seidenlegal.com

/s/ Michael J. Maloney
Michael J. Maloney, Esq.
CKR Law LLP
1330 Avenue of the Americas, 14th Floor
New York, NY 10019
646-564-3510
mmaloney@ckrlaw.com